

HANSON BRIDGETT LLP
PATRICK GLENN- 141604
pglenn@hansonbridgett.com
KEVIN REESE - 172992
kreese@hansonbridgett.com
JAHMAL T. DAVIS - 191504
jdavis@hansonbridgett.com
425 Market Street, 26th Floor
San Francisco, CA 94105
Telephone: (415) 777-3200
Facsimile: (415) 541-9366

Attorneys for Defendants
AMERICA WEST AIRLINES, INC. and
U.S. AIRWAYS, INC.

CURTIS G. OLER (Bar No. 63689)
LAW OFFICES OF CURTIS G. OLER
Post Office Box 15083
San Francisco, California 94115
Telephone: (415) 346-8015
Facsimile: (415) 346-8238

Attorney for Plaintiff
CLARISE JOY STEMLEY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CLARISE JOY STEMLEY,
Plaintiff,

v.

AMERICA WEST AIRLINES, INC.; US
AIRWAYS, INC.; and DOES 1
THROUGH 25,
Defendants.

No. 3:08-cv-02040-TEH

**PLAINTIFF CLARISE STEMLEY AND
DEFENDANTS AMERICA WEST
AIRLINES, INC. AND U.S. AIRWAYS,
INC.'s JOINT DISCOVERY PLAN**

1 Having met and conferred in accordance with Federal Rule of Civil Procedure
2 Rule 26(f), and having discussed the matters required under that Rule, Defendants
3 America West Airlines, Inc. and U.S. Airways, Inc. (hereinafter collectively, "Defendants")
4 and Plaintiff Clarise Joy Stemley (hereinafter "Plaintiff") submit the following discovery
5 plan:

6 1. No changes need be made to the timing of disclosures required under
7 FRCP 26(a). Initial disclosures will be made on or before August 11, 2008, in
8 accordance with FRCP 26(a).

9 2. The subjects on which discovery is needed include Plaintiff's application,
10 qualifications, work history, medical history and damage claims. Discovery should be
11 completed one month before trial, and the parties do not believe that discovery should
12 be conducted in phases or limited or focused on particular issues. Defendants will take
13 Plaintiff's deposition and anticipate serving written discovery, including interrogatories,
14 requests for production of documents and requests for admission. Plaintiff agrees to
15 disclose the names and addresses of all medical providers who treated Plaintiff during
16 her employment with Defendants. Defendants request that the Court set Plaintiff's
17 deposition first. Plaintiff and Defendants are agreeable to allowing Defendants two days
18 to complete Plaintiff's deposition.

19 3. The parties are not aware of any issue relating to disclosure or discovery of
20 electronically stored information at this time.

21 4. The parties are not aware of any issues relating to claims of privilege or of
22 protection of trial-preparation material at this time.

23 5. No changes should be made on the limitation of discovery imposed by the
24 Federal Rules of Civil Procedure or local discovery rules.

25 6. The parties do not request any court orders pursuant to FRCP 26(c) or
26 Rule 16(b).

27 ///

28 ///

1 DATED: July 14, 2008

HANSON BRIDGETT LLP

2 By: /s/ Jahmal T. Davis

3 PATRICK GLENN

4 KEVIN D. REESE

5 JAHMAL T. DAVIS

6 Attorneys for Defendants

AMERICA WEST AIRLINES, INC. and

U.S. AIRWAYS, INC.

7 DATED: July 14, 2008

LAW OFFICES OF CURTIS G. OLER

8 By: /s/ Curtis G. Oler

9 CURTIS G. OLER

10 Attorneys for Plaintiff

11 CLARISE JOY STEMLEY